

PSJ10 Exh 56

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF OHIO
3 EASTERN DIVISION

5 IN RE: NATIONAL : MDL NO. 2804
 PRESCRIPTION OPIATE :
6 LITIGATION :

7 : CASE NO.
THIS DOCUMENT : 1:17-MD-2804
8 RELATES TO ALL CASES :
: Hon. Dan A.
9 : Polster

11 SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
12 IN RE OPIOID : Index No. 400000/2017
LITIGATION : Suffolk County

14 CIRCUIT COURT OF COOK COUNTY
15 COOK COUNTY, ILLINOIS
16 THE PEOPLE OF THE : Case No. 2017L 013180
STATE OF ILLINOIS, : Consolidated with
17 AND COOK COUNTY : 2018L 3908 (JERSEY COUNTY)
ILLINOIS : 2018L 2943 (KANE COUNTY)
18 : 2018L 2916 (MACON COUNTY)
V. : 2018L 2948 (MCHENRY
COUNTY)
19 : 2018L 3728 (LAKE COUNTY)
PURDUE PHARMA, L.P. : 2018L 3909 (UNION COUNTY)
ET AL. :

21 JENNIFER ALTIER
Thursday, August 2, 2018

23 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

1 - - -
2 Videotaped deposition of
3 JENNIFER ALTIER, taken pursuant to
4 notice, was held at the law offices of
5 Carella Byrne Cecchi Olstein Brody & Agnello,
6 PC, 5 Becker Farm Road, Roseland, New Jersey
7 07068, beginning at 9:05 a.m., on the above
8 date, before Amanda Dee Maslynsky-Miller, a
9 Certified Realtime Reporter.

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GOLKOW LITIGATION SERVICES
16 877.370.3377 ph| 917.591.5672 fax
deps@golkow.com

17

18

19

20

21

22

23

24

1 APPEARANCES:

2

3

ROBBINS GELLER RUDMAN & DOWD LLP

BY: AELISH MARIE BAIG, ESQUIRE

4

BY: MATTHEW S. MELAMED, ESQUIRE

Post Montgomery Center

5

One Montgomery Street

Suite 1800

6

San Francisco, California 94104

(415) 288-4545

7

aelishb@rgrdlaw.com

Mmelamed@rgrdlaw.com

8

Representing the Plaintiffs

9

10

KIRKLAND & ELLIS LLP

11

BY: MARTIN L. ROTH, ESQUIRE

BY: ZACHARY A. CUIILLO, ESQUIRE

12

300 North LaSalle

Chicago, Illinois 60654

13

(312) 862-2000

martin.roth@kirkland.com

14

Zac.ciullo@kirkland.com

Representing Allergan Finance, LLC

15

16

17

JONES DAY

BY: BRANDY HUTTON RANJAN, ESQUIRE

18

325 John H. McConnell Boulevard

Suite 600

19

Columbus, Ohio 43215

(614) 469-3939

20

branjana@jonesday.com

Representing Walmart, Inc.

21

22

23

24

1 APPEARANCES: (Continued)

2

3 WILLIAMS & CONNOLLY LLP
4 BY: ANDREW C. MCBRIDE, ESQUIRE
5 725 Twelfth Street NW
6 Washington, D.C. 20005
7 (202) 434-5000
8 amcbride@wc.com
9 Representing Cardinal Health

7

8 ALLEGAERT BERGER & VOGEL
9 BY: LAUREN J. PINCUS, ESQUIRE
10 111 Broadway
11 20th Floor
12 New York, New York 10006
13 (212) 616-7057
14 lpincus@abv.com
15 Representing Rochester Drug Cooperative

12

13 VIA TELECONFERENCE:

14

15 REED SMITH LLP
16 BY: ANNE E. ROLLINS, ESQUIRE
17 Three Logan Square, 1717 Arch Street
18 Suite 3100
19 Philadelphia, Pennsylvania 19103
20 (215) 851-8100
21 arollins@reedsmith.com
22 Representing AmerisourceBergen

18

20 MARCUS & SHAPIRA LLP
21 BY: ZACHARY FENSTEMAKER, ESQUIRE
22 One Oxford Centre
23 35th Floor
24 Pittsburgh, Pennsylvania 15219
(412) 338-3345
Fenstemaker@marcus-shapira.com
Representing HBC Service Company

24

1 APPEARANCES: (Continued)

2

3 SIMMONS HANLY CONROY LLC
BY: JAYNE CONROY, ESQUIRE
4 112 Madison Avenue
7th Floor
5 New York, New York 10016
(212) 784-6400
6 JConroy@simmonsfirm.com
Representing Plaintiffs

7

8

9 JACKSON KELLY PLLC
BY: DOUGLAS J. CROUSE, ESQUIRE
10 500 Lee Street East
Suite 1600
11 Charleston, West Virginia 25301
(304) 340-1347
12 dcrouse@jacksonkelly.com
Representing Miami-Luken

13

14

15

ARNOLD & PORTER KAYE SCHOLER LLP
16 BY: JOANNA PERSIO, ESQUIRE
601 Massachusetts Ave, NW
17 Washington, D.C. 20001
(202) 942-5000
18 joanna.persio@arnoldporter.com
Representing Endo Pharmaceuticals

19

20

21

22

23

24

1 APPEARANCES: (Continued)

2

3 MORGAN, LEWIS & BOCKIUS LLP

BY: TINOS DIAMANTATOS, ESQUIRE

4 77 West Wacker Drive

Chicago, Illinois 60601

5 (312) 324-1000

tinios.diamantatos@morganlewis.com

6 Representing Teva Pharmaceuticals, Inc.,

Cephalon, Inc., Watson Laboratories,

7 Actavis LLC, and Actavis Pharma, Inc.

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11 ALSO PRESENT:

David Lane, Videographer

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1 marketing of generics?

2 A. I did not. Other than when
3 Kadian went generic. And I may have
4 advised on some other generic.

5 But my responsibilities and
6 my expertise is in branded marketing. I
7 don't have any expertise in generic
8 marketing.

9 Q. But you may have advised, I
10 think you said, on certain generic
11 issues?

12 MR. ROTH: Object to the
13 form. Mischaracterizes testimony.

14 THE WITNESS: No, if I said
15 that, that's not what I meant.

16 I may have been in meetings
17 for generic products, but that was
18 not my area of expertise.

19 BY MS. BAIG:

20 Q. Were you in meetings for
21 generic opioids?

22 MR. ROTH: Same objection.

23 THE WITNESS: Perhaps.

24 BY MS. BAIG:

1 Q. You don't recall any?

2 A. Not off the top of my head,
3 no.

4 Q. Do you recall being in
5 meetings or having discussions about
6 oxymorphone?

7 A. I recall that for a short
8 period of time our sales force may have
9 helped promote the availability of that.

10 Q. The Kadian sales force
11 helped promote the availability of
12 oxymorphone?

13 A. I believe so.

14 Q. Do you remember being
15 involved with any other generic opioids?

16 A. Just generic Kadian.

17 Q. So your understanding is
18 that Nathalie Leitch reported to Terry
19 Fullem?

20 A. Correct.

21 Q. And Terry Fullem worked in
22 what department?

23 A. Sort of headed up commercial
24 operations, if I'm not mistaken.

1 Q. Commercial operations for
2 Actavis?

3 A. Yes, that was the company.
4 But, again, I don't want to say don't
5 quote me on his title, but I don't recall
6 what his title is.

7 Q. And Terry Fullem reported to
8 who?

9 A. I believe he reported to
10 Doug Boothe.

11 Q. And Doug Boothe, do you know
12 what his position was?

13 A. I believe he was CEO.

14 Q. And he was the CEO of what
15 company?

16 A. Actavis.

17 Q. And who did he report to?

18 A. I don't know, whoever the
19 chairman of the board was, I guess.

20 Q. Did you ever work on a drug
21 called Norco?

22 A. No, not that I recall.

23 Q. Do you know who did work on
24 the drug called Norco?

1 Watson terminated them at the end of
2 2012.

3 Q. Did the sales force report
4 to you?

5 A. No.

6 Q. Who did they report to?

7 A. They were a contract sales
8 force that reported up through inVentiv.

9 Q. And who at inVentiv oversaw
10 that sales force?

11 A. I don't know. I just know
12 the people I worked with.

13 Q. Who did you work with at
14 inVentiv?

15 A. The primary contacts, the
16 heads of sales were Mike Shepherd, Mark
17 Killion, and then later on Chris Hepp and
18 Patrick Lanahan.

19 Q. And what was inVentiv?

20 A. A contract sales force
21 organization.

22 Q. So was your entire sales
23 force, were they all inVentiv employees?

24 A. Yes.

1 Q. And that team was
2 responsible for marketing Kadian as well
3 as generic opioids?

4 MR. ROTH: Object to the
5 form. Lacks foundation.
6 Mischaracterizes the record.

7 MS. BAIG: It's a question.
8 No speaking objections, counsel.

9 MR. ROTH: It's not a
10 speaking objection.

11 MS. BAIG: It's in the
12 deposition protocol.

13 MR. ROTH: It's the basis
14 for my objection.

15 BY MS. BAIG:

16 Q. Did the sales team that we.
17 We're -- that we been
18 talking about, the inVentiv sales team,
19 were they responsible for marketing
20 Kadian and generic opioids?

21 MR. ROTH: Object to the
22 form.

23 THE WITNESS: They were
24 responsible for promoting. I was

1 responsible for marketing, they
2 were responsible for promoting
3 Kadian almost exclusively; except
4 when Kadian went generic, they
5 were responsible for the promotion
6 of Kadian generic, and as I
7 mentioned, for a short time
8 period, the generic oxymorphone.

9 BY MS. BAIG:

10 Q. And that team, I believe you
11 said, grew from 18 to about what, do you
12 know?

13 A. I mentioned I don't remember
14 the ceiling number.

15 Q. Do you know if it doubled in
16 size or tripled in size, or if it just
17 grew slightly from 18?

18 A. My best guess, recollection,
19 is about 48.

20 Q. 48?

21 A. Uh-huh.

22 Q. And what time frame was it
23 about 48 employees?

24 A. That, I don't recall.

1 Q. Some time in the 2010 to
2 2014 time frame?

3 A. Oh, no. They were
4 terminated by 2012. So some time between
5 2010 and 2012.

6 Q. And what happened with the
7 marketing of Kadian in 2012 when the
8 sales force was terminated?

9 A. Right. Watson debated what
10 to do with it for a while. But,
11 basically, no longer promoted it, the
12 promotion wound down.

13 Q. And how about, what happened
14 with marketing of the generic as of 2012,
15 when that sales force was terminated?

16 A. Well, they weren't marketing
17 the generic, so there was no marketing,
18 as far as I'm aware.

19 Q. Well, the promotion of the
20 generics?

21 A. That's what I mean. I don't
22 know. There was no more sales force.

23 Q. Were there any mergers --
24 were there any other mergers, other than